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August 18, 2003

Marianne L. Horinko, Acting Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
Room 3000, #1101-A
1200 Pennsylvania Ave., N.W.
Washington, DC 20460

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Subject: Comments on the HPV Test Plan for the Amine Heads category

Dear Administrator Horinko:

The following comments on the E.I. du Pont de Nemours & Company, Inc. and Solutia, Inc. (DuPont) test plan for the Amine Heads category are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These health, animal protection, and environmental organizations have a combined membership of more than ten million Americans.

Dupont submitted its test plan on April 11, 2003 for the chemicals 1,6-hexanediamine (HMD, CAS No. 124-09-4), 1,2-cyclohexanediamine (DCH, CAS No. 694-83-7) and 2-methyl-1,5-pentanediamine (MPMD, CAS No. 15520-10-2). The major uses and hazards are well characterized for the chemicals in the test plan, and a concise and complete description is given for the required endpoints. Category justification for these three chemicals is found in structural, chemical and behavioral similarities. Additionally, environmental fate and toxicity data are well correlated. The toxicologic database for these chemicals is mostly complete, and data gaps only exist in the developmental and reproductive toxicity areas for DCH and MPMD. HMD has been tested using both inhalation and oral routes, and results do not suggest that HMD is a developmental or reproductive toxin. Some existing short duration studies, one of which was a study done on a mixture of category chemicals, suggest that similar results to HMD would be shown, and so no new testing need take place.

We applaud DuPont's efforts at ensuring all available information is provided for the Amine Heads and concur that no additional animal testing is necessary under the HPV Challenge Program. This approach is consistent with the EPA's stated goal of maximizing the use of existing data in order to limit additional animal testing and to avoid a mere box-checking approach to toxicology. Thank you for your attention to these comments. I may be reached at 202-686-2210, ext. 335, or via e-mail at kstoick@pcrm.org.

Sincerely,

Kristie M Stoick, M.P.H.
Research Analyst

Chad B. Sandusky, Ph.D.
Director of Research